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November 2, 2022

By ECF

The Honorable Diane Gujarati  
United States District Judge  
United States Courthouse  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Ralph DiMatteo, et al.  
21 Cr. 466 (S-1) (DG) (JRC)

Dear Judge Gujarati:

I write on behalf of all defendants except Theodore Persico seeking a thirty-two (32) day extension of time for the defendants to file motions. The present schedule calls for motions to be filed by November 7, 2022. If the extension is granted, the jointly-proposed briefing schedule would be as follows:

December 9, 2022: Defense Motions

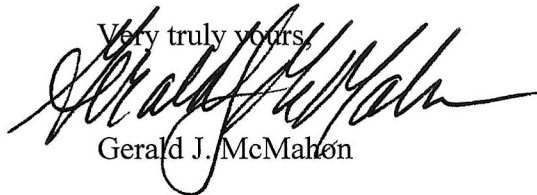
January 13, 2023: Gov't Opposition & joint letter on proposed trial groups

January 20, 2023: Defense Replies

February/March: Status conference to be set at a date/time convenient for the Court (with request that time be excluded until that date)

The government, by Assistant United States Devon Lash, consents to this request. This motion for additional time has been made necessary by the voluminous nature of the discovery (10 productions containing double-digit terrabytes of material), and by the fact that plea negotiations are ongoing and serious

Very truly yours,



Gerald J. McMahon

GJM:dlg

cc: All Counsel (By ECF)